FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Ag Producer Services, Cargill, Inc.
500 East State Road 28
Tipton, Indiana 46072

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F159-12501-00005	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 14, 2001 Expiration Date: December 14, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wholesale grain processing operation.

Authorized individual:	Peter Schram
Source Address:	500 East Road 28, Tipton, Indiana 46070
Mailing Address:	P.O. Box 337, Tipton, Indiana 46072-0337
SIC Code:	5153
Source Location Status:	Tipton
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Four (4) grain elevator systems, identified as emission units ID 1, 2, 3, and 4, with a maximum total rate of forty (40) million bushels of grain per year, using a polypropylene baghouse each for control, exhausting through four (4) stacks, identified as S-1, S-2, S-3, and S-4. The four systems are:

(1) System 1, using a polypropylene baghouse, identified as DS-1, for particulate control, exhausting through a stack, identified as S-1, consists of the following emission units:

(A) One (1) truck receiving area, identified as Truck Dump #1, with a maximum hourly capacity of 1,200,000 pounds;

(B) Grain handling from Truck Dump #1 to Belt Con (BC-1), with a maximum hourly capacity of 1,200,000 pounds;

(C) Grain handling from BC-1 to Leg 1 with a maximum hourly capacity of 1,200,000 pounds;

(D) Grain handling from DC-1 to Leg 3, with a maximum hourly capacity of 600,000 pounds;

(E) Grain handling from BC-1 to Leg 4, with a maximum hourly capacity of 600,000 pounds;

(F) Grain handling from Leg 3 to Dryer #2, with a maximum hourly capacity of 600,000 pounds;

(G) Grain handling from Dryer #2 to DC-2, with a maximum hourly capacity of 600,000 pounds;

(H) Grain handling from Leg 3 to DC-3, with a maximum hourly capacity of 600,000 pounds;

(I) Grain handling from Dryer #1 to DC-3, with a maximum hourly capacity of 600,000 pounds;

(J) Grain handling from DC-2 to Leg 4, with a maximum hourly capacity of 600,000 pounds;

(2) System 2, using a polypropylene baghouse, identified as DS-2, for particulate control, exhausting through a stack, identified as S-2, consists of the following emission units:

(A) Grain handling from Leg 1 to Rail loadout, with a maximum hourly capacity of 1,200,000 pounds;

(B) Grain handling from Leg 1 to Bins, with a maximum hourly capacity of 1,200,000 pounds;

(C) Grain handling from Leg 1 to BC-2 with a maximum hourly capacity of 1,200,000 pounds;

(D) Grain handling from Leg 4 to DC-3, with a maximum hourly capacity of 600,000 pounds;

(E) Grain handling from DC-3 to Bins, with a maximum hourly capacity of 600,000 pounds;

(F) Grain handling from DC-3 to DC-4 with a maximum hourly capacity of 600,000 pounds;

(G) Grain handling from Leg 4 to BC-2, with a maximum hourly capacity of 600,000 pounds;

(H) Grain handling from Leg 4 to Bins, with a maximum hourly capacity of 600,000 pounds;

(I) Grain handling from Leg 5 to Bins, with a maximum hourly capacity of 900,000 pounds;

(J) Grain handling from Leg 5 to BC-6, with a maximum hourly capacity of 900,000 pounds;

(K) Grain handling from DC-6 to BC-7, with a maximum hourly capacity of 1,200,000 pounds;

(L) Grain handling from BC-7 to Bins, with a maximum hourly capacity of 1,200,000 pounds;

(M) Grain handling from Leg 5 to BC-4, with a maximum hourly capacity of 900,000 pounds;

(N) Grain handling from Bins to DC-1, with a maximum hourly capacity of 600,000 pounds;

(O) Grain handling from BC-2 to Bins with a maximum hourly capacity of 1,200,000 pounds;

(P) Grain handling from BC-2 to BC-3 with a maximum hourly capacity of 1,200,000 pounds;

(Q) Grain handling from BC-3 to Bins, with a maximum hourly capacity of 1,200,000 pounds;

(R) Grain handling from Tank 100 to BC-11, with a maximum hourly capacity of 2,400,000 pounds;

(S) Grain handling from Tank 200 to BC-11 with a maximum hourly capacity of 2,400,000 pounds;

(T) Totally enclosed grain handling from Tank 300 to BC-12 with a maximum hourly capacity of 2,400,000 pounds;

(U) Totally enclosed grain handling from Tank 400 to BC-12 with a maximum hourly capacity of 2,400,000 pounds;

(V) Totally enclosed grain handling from BC-12 to BC-11 with a maximum hourly capacity of 2,400,000 pounds;

(W) Totally enclosed grain handling from BC-11 to BC-10 with a maximum hourly capacity of 2,400,000 pounds;

(X) Grain handling from Bins to BC-10 with a maximum hourly capacity of 2,400,000 pounds;

(Y) Grain handling from BC-10 to Leg 1 with a maximum hourly capacity of 1,200,000 pounds;

(Z) Grain handling from BC-10 to Leg 2 with a maximum hourly capacity of 1,200,000 pounds;

(AA) Grain handling from Leg 2 to Scales with a maximum hourly capacity of 1,200,000 pounds;

(BB) Grain handling from Scales to Rail Loadout with a maximum hourly capacity of 250,192 pounds; and

(CC) Grain handling from Shipping to Rail Loadout, with a maximum hourly capacity of 2,400,000 pounds.

(3) System 3, using a polypropylene baghouse, identified as DS-3, for particulate control, exhausting through a stack identified as S-3, consists of the following emission units:

(A) Grain handling from DC-4 to Tank 100, with a maximum hourly capacity of 600,000 pounds;

(B) Grain handling from BC-3 to BC-4 with a maximum hourly capacity of 1,200,000 pounds;

(C) Grain handling from BC-4 to Tank 100 with a maximum hourly capacity of 1,200,000 pounds;

(D) Totally enclosed grain handling from BC-4 to BC-5 with a maximum hourly capacity of 1,200,000 pounds;

(E) Totally enclosed grain handling from BC-5 to Tank 200 with a maximum hourly capacity of 1,200,000 pounds;

(F) Totally enclosed grain handling from BC-5 to BC-6 with a maximum hourly capacity of 1,200,000 pounds;

(G) Totally enclosed grain handling from BC-6 to Tank 300 with a maximum hourly capacity of 1,200,000 pounds;

(H) Totally enclosed grain handling from BC-6 to BC-7 with a maximum hourly capacity of 1,200,000 pounds; and

(I) Totally enclosed grain handling from BC-7 to Tank 400 with a maximum hourly capacity of 1,200,000 pounds.

(4) System 4 using a polypropylene baghouse, identified as DS-4, for particulate control, exhausting through a stack, identified as S-4, consists of the following emission units:

(A) One (1) truck receiving area, identified as Truck Dump #2, with a maximum yearly capacity of 900,000 pounds;

(B) Grain handling from Truck Dump #2 to DC-51, with a maximum hourly capacity of 900,000 pounds; and

(C) Grain handling from DC-51 to Leg 5, with a maximum hourly capacity of 900,000 pounds.

(b) One (1) outdoor grain stockpile, identified as FS-3, with a maximum storage of one and two-tenths (1.2) million bushels of grain.

(c) Two (2) grain dryers, identified as emission unit ID 5 and 6, heated by natural gas, with a heat input rate of forty five (45) million Btu (MMBtu) per hour, exhausting through one (1) stack each, identified as S-5 and S-6, respectively.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

There are no specifically regulated insignificant activities at this source.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8 -5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or,

for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than or July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper

maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ , any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement,

report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) Four (4) grain elevator systems, identified as emission units ID 1, 2, 3, and 4, with a maximum total rate of forty (40) million bushels of grain per year, using a polypropylene baghouse each for control, exhausting through four (4) stacks, identified as S-1, S-2, S-3, and S-4. The four systems are:

(1) System 1, using a polypropylene baghouse, identified as DS-1, for particulate control, exhausting through a stack, identified as S-1, consists of the following emission units:

(A) One (1) truck receiving area, identified as Truck Dump #1, with a maximum hourly capacity of 1,200,000 pounds;

(B) Grain handling from Truck Dump #1 to Belt Con (BC-1), with a maximum hourly capacity of 1,200,000 pounds;

(C) Grain handling from BC-1 to Leg 1 with a maximum hourly capacity of 1,200,000 pounds;

(D) Grain handling from DC-1 to Leg 3, with a maximum hourly capacity of 600,000 pounds;

(E) Grain handling from BC-1 to Leg 4, with a maximum hourly capacity of 600,000 pounds;

(F) Grain handling from Leg 3 to Dryer #2, with a maximum hourly capacity of 600,000 pounds;

(G) Grain handling from Dryer #2 to DC-2, with a maximum hourly capacity of 600,000 pounds;

(H) Grain handling from Leg 3 to DC-3, with a maximum hourly capacity of 600,000 pounds;

(I) Grain handling from Dryer #1 to DC-3, with a maximum hourly capacity 600,000 pounds;

(J) Grain handling from DC-2 to Leg 4, with a maximum hourly capacity of 600,000 pounds;

(2) System 2, using a polypropylene baghouse, identified as DS-2, for particulate control, exhausting through a stack, identified as S-2, consists of the following emission units:

(A) Grain handling from Leg 1 to Rail loadout, with a maximum hourly capacity of 1,200,000 pounds;

(B) Grain handling from Leg 1 to Bins, with a maximum hourly capacity of 1,200,000 pounds;

(C) Grain handling from Leg 1 to BC-2 with a maximum hourly capacity of 1,200,000 pounds;

(D) Grain handling from Leg 4 to DC-3, with a maximum hourly capacity of 600,000 pounds;

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-8-4(10)]:

(E) Grain handling from DC-3 to Bins, with a maximum hourly capacity of 600,000 pounds;

(F) Grain handling from DC-3 to DC-4 with a maximum hourly capacity of 600,000 pounds;

(G) Grain handling from Leg 4 to BC-2, with a maximum hourly capacity of 600,000 pounds;

(H) Grain handling from Leg 4 to Bins, with a maximum hourly capacity of 600,000 pounds;

(I) Grain handling from Leg 5 to Bins, with a maximum hourly capacity of 900,000 pounds;

(J) Grain handling from Leg 5 to BC-6, with a maximum hourly capacity of 900,000 pounds;

(K) Grain handling from DC-6 to BC-7, with a maximum hourly capacity of 1,200,000 pounds;

(L) Grain handling from BC-7 to Bins, with a maximum hourly capacity of 1,200,000 pounds;

(M) Grain handling from Leg 5 to BC-4, with a maximum hourly capacity of 900,000 pounds;

(N) Grain handling from Bins to DC-1, with a maximum hourly capacity of 600,000 pounds;

(O) Grain handling from BC-2 to Bins with a maximum hourly capacity of 1,200,000 pounds;

(P) Grain handling from BC-2 to BC-3 with a maximum hourly capacity of 1,200,000 pounds;

(Q) Grain handling from BC-3 to Bins, with a maximum hourly capacity of 1,200,000 pounds;

(R) Grain handling from Tank 100 to BC-11, with a maximum hourly capacity of 2,400,000 pounds;

(S) Grain handling from Tank 200 to BC-11 with a maximum hourly capacity of 2,400,000pounds;

(T) Totally enclosed grain handling from Tank 300 to BC-12 with a maximum hourly capacity of 2,400,000 pounds;

(U) Totally enclosed grain handling from Tank 400 to BC-12 with a maximum hourly capacity of 2,400,000 pounds;

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-8-4(10)]:

(V) Grain handling from BC-12 to BC-11 with a maximum hourly capacity of 2,400,000 pounds;

(W) Totally enclosed grain handling from BC-11 to BC-10 with a maximum hourly capacity of 2,400,000 pounds;

(X) Grain handling from Bins to BC-10 with a maximum hourly capacity of 2,400,000 pounds;

(Y) Grain handling from BC-10 to Leg 1 with a maximum hourly capacity of 1,200,000 pounds;

(Z) Grain handling from BC-10 to Leg 2 with a maximum hourly capacity of 1,200,000 pounds;

(AA) Grain handling from Leg 2 to Scales with a maximum hourly capacity of 1,200,000 pounds;

(BB) Grain handling from Scales to Rail Loadout with a maximum hourly capacity of 250,192 pounds; and

(CC) Grain handling from Shipping to Rail Loadout, with a maximum hourly capacity of 2,400,000 pounds.

(3) System 3, using a polypropylene baghouse, identified as DS-3, for particulate control, exhausting through a stack identified as S-3, consists of the following emission units:

(A) Grain handling from DC-4 to Tank 100, with a maximum hourly capacity of 600,000 pounds;

(B) Grain handling from BC-3 to BC-4 with a maximum hourly capacity of 1,200,000 pounds;

(C) Grain handling from BC-4 to Tank 100 with a maximum hourly capacity of 1,200,000 pounds;

(D) Totally enclosed grain handling from BC-4 to BC-5 with a maximum hourly capacity of 1,200,000 pounds;

(E) Totally enclosed grain handling from BC-5 to Tank 200 with a maximum hourly capacity of 1,200,000 pounds;

(F) Totally enclosed grain handling from BC-5 to BC-6 with a maximum hourly capacity of 1,200,000 pounds;

(G) Totally enclosed grain handling from BC-6 to Tank 300 with a maximum hourly capacity of 1,200,000 pounds;

(H) Totally enclosed grain handling from BC-6 to BC-7 with a maximum hourly capacity of 1,200,000 pounds; and

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-8-4(10)]:

(l) Totally enclosed grain handling from BC-7 to Tank 400 with a maximum hourly capacity of 1,200,000 pounds.

(4) System 4 using a polypropylene baghouse, identified as DS-4, for particulate control, exhausting through a stack, identified as S-4, consists of the following emission units:

(A) One (1) truck receiving area, identified as Truck Dump #2, with a maximum yearly capacity of 900,000 pounds;

(B) Grain handling from Truck Dump #2 to DC-51, with a maximum hourly capacity of 900,000 pounds; and

(C) Grain handling from DC-51 to Leg 5, with a maximum hourly capacity of 900,000 pounds.

(b) One (1) outdoor grain stockpile, identified as FS-3, with a maximum storage of one and two-tenths (1.2) million bushels of grain.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Standards of Performance for Grain Elevators [326 IAC 12 (40 CFR 60.302, Subpart DD)]

For each of the stacks (1-4) associated with the grain elevators, the following apply:

(a) The permittee shall not cause to be discharged into the atmosphere from grain elevator stacks 1-3 any process emission which:

(1) Contains particulate matter in excess of 0.023 grains per dry standard cubic meter (ca. 0.01 grains per dry standard cubic foot); and

(2) Exhibits greater than zero (0) percent opacity.

(b) The permittee shall not cause to be discharged into the atmosphere any fugitive emissions from:

(1) Any individual truck unloading station, railcar unloading station, or rail car loading station which exhibits greater than five (5) percent opacity;

(2) Any grain handling operation which exhibits greater than zero (0) percent opacity; and

(3) Any truck loading station that exhibits greater than ten (10) percent opacity.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions from the equipment listed above shall not exceed the pound per hour emission rate reported below:

Process/Facility	Process Weight Rate (lb/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
Receiving			
Truck Dump #1	1,200,000	600	71.16
Truck Dump #2	900,000	450	67.70
Handling			
Truck Dump #1 to BC-1	1,200,000	600	71.16
BC-1 to Leg 1	1,200,000	600	71.16
DC-1 to Leg 3 (see dryers)	600,000	300	63.00
Leg 1 to Rail Loadout (see loadout)	1,200,000	600	71.16
Leg 1 to Bins	1,200,000	600	71.16
Leg 1 to BC-2 (see transfer)	1,200,000	600	71.16
BC-1 to Leg 4 (25% of grain received)	600,000	300	63.00
Leg 4 to DC-3 (includes dryer recycle)	600,000	300	63.00
DC-3 to Bins	600,000	300	63.00
DC-3 to DC-4	600,000	300	63.00
DC-4 to Tank 100 (20% of grain received)	600,000	300	63.00
Leg 4 to BC-2 (includes dryer recycle)	600,000	300	63.00
Leg 4 to Bins (includes dryer recycle)	600,000	300	63.00
Truck Dump #2 to DC-51	900,000	450	67.70
DC-51 to Leg 5	900,000	450	67.70
Leg 5 to Bins (45% of grain received)	900,000	450	67.70
Leg 5 to BC-6 (45% of grain received)	900,000	450	67.70
DC-6 to BC-7	1,200,000	600	71.16
BC-7 to Bins	1,200,000	600	71.16
DC-1 to Leg 3 (see dryers)	600,000	300	63.00
Leg 5 to BC-4 (see transfers)	900,000	450	67.70
Bins to DC-1	600,000	300	63.00
DC-1 to Leg 3	600,000	300	63.00
Leg 3 to Dryer #2	600,000	300	63.00
Dryer #2 to DC-2	600,000	300	63.00
Leg 3 to DC-3	600,000	300	63.00
Dryer #1 to DC-3	600,000	300	63.00
DC-2 to Leg 4 (see receiving)	600,000	300	63.00
BC-2 to Bins	1,200,000	600	71.16
BC-2 to BC-3	1,200,000	600	71.16
BC-3 to Bins	1,200,000	600	71.16
BC-3 to BC-4	1,200,000	600	71.16
BC-4 to Tank 100	1,200,000	600	71.16
BC-4 to BC-5	1,200,000	600	71.16
BC-5 to Tank 200	1,200,000	600	71.16

Process/Facility	Process Weight Rate (lb/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
BC-5 to BC-6	1,200,000	600	71.16
BC-6 to Tank 300	1,200,000	600	71.16
BC-6 to BC-7	1,200,000	600	71.16
BC-7 to Tank 400	1,200,000	600	71.16
Tank 100 to BC-11	2,400,000	1,200	79.97
Tank 200 to BC-11	2,400,000	1,200	79.97
Tank 300 to BC-12	2,400,000	1,200	79.97
Tank 400 to BC-12	2,400,000	1,200	79.97
BC-12 to BC-11	2,400,000	1,200	79.97
BC-11 to BC-10	2,400,000	1,200	79.97
Bins to BC-10 (+10% recycle)	2,400,000	1,200	79.97
BC-10 to Leg 1 (10% recycle)	1,200,000	600	71.16
BC-10 to Leg 2 (see loadout)	1,200,000	600	71.16
Leg 2 to Scales	1,200,000	600	71.16
Scales to Rail Loadout	250,192	125.10	53.55
Shipping			
Rail Loadout	2,400,000	1,200	79.97

These limits were calculated using the following equations:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Particulate Matter (PM) Limitations [326 IAC 2-2][40 CFR 52.21][326 IAC 2-8-4]

(a) The grain elevators shall be limited to forty million (40,000,000) bushels of grain per 12 consecutive month period. The source shall be limited to PM emissions of 0.035 pounds per ton of grain for receiving units, 0.61 pounds per ton of grain for handling units, 0.22 pounds per ton of grain for drying units, and 0.027 for the shipping units. These limitations are equivalent to limiting PM emissions to less than two hundred fifty (250) tons per year. Compliance with these limits and the use of the baghouses makes 326 IAC 2-2 and 40 CFR 52.21, not applicable.

(b) The grain elevators shall be limited to forty million (40,000,000) bushels of grain per 12 consecutive month period. The source shall be limited to PM10 emissions of 0.0078 pounds per ton of grain for receiving units, 0.034 pounds per ton of grain for handling units, 0.055 pounds per ton of grain for drying units, and 0.0022 pounds per ton of grain for shipping units. These limitations are equivalent to limiting PM10 emissions to less

than one hundred (100) tons per year (22.83 lb/hr). Compliance with these limits and the use of baghouses make 326 IAC 2-7 (Part 70 Permit program) not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

In order to comply with D.1.1, D.1.2, and D.1.3, each baghouse shall be in operation at all times that its respective facility is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

(a) Visible emission notations of each stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the processes mentioned above, at least once per shift when the processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 0.5 and 0.6 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the processes mentioned above when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with D.1.3, the Permittee shall maintain records of the bushels of grain processed.

(b) To document compliance with Condition D.1.1 and D.1.6, the Permittee shall maintain records of visible emission notations of the stack exhaust once per shift.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain the following:

(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(d) To document compliance with D.1.8, the Permittee shall maintain records of the results of the inspections required.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(c) Two (2) grain dryers, identified as emission unit ID 5 and 6, heated by natural gas, with a heat input rate of forty-five (45) million Btu per hour, exhausting through one (1) stack each, identified as S-5 and S-6, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions from the equipment listed above shall not exceed the pound per hour emission rate reported below:

Process/Facility	Process Weight Rate (lb/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
Drying			
Drying #1	600,000	300	63.00
Drying #2	600,000	300	63.00

These limitations were based on the equation below:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The grain elevators shall be limited to forty million (40,000,000) bushels of grain dried per 12 consecutive month period. This limit is required to limit the potential to emit of particulate matter to below 250 tons per year. Compliance with this limit and the use of the baghouses make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.3 FESOP PM10 Limit [326 IAC 2-8-4]

The source shall limit PM10 emissions to less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will be in compliance with this limitation by limiting the grain elevators to forty million (40,000,000) bushels of grain per twelve (12) consecutive month period and by using the baghouses.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

(a) Visible emission notations of the grain dryer stacks exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.6 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the grain dryer stacks exhaust once per shift.

(b) To document compliance with D.2.2 and D.2.3, the Permittee shall maintain records of the bushels of grain processed.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual”as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Ag Producer Services, Cargill, Inc.
Source Address: 500 East State Road 28, Tipton, Indiana 46072-0337
Mailing Address: P.O. Box 337, Tipton, Indiana 46072-0337
FESOP No.: F109-12501-00005

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone Number:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Ag Producer Services, Cargill, Inc.
Source Address: 500 East State Road 28, Tipton, Indiana 46072-0337
Mailing Address: P.O. Box 337, Tipton, Indiana 46072-0337
FESOP No.: F109-12501-00005

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Ag Producer Services, Cargill, Inc.
Source Address: 500 East State Road 28, Tipton, Indiana 46072-0337
Mailing Address: P.O. Box 337, Tipton, Indiana 46072-0337
FESOP No.: F109-12501-00005
Facility: Grain Elevators 1-4, Grain Dryers
Parameter: Bushels of grain processed
Limit: 40,000,000 Bushels per 12 consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Ag Producer Services, Cargill, Inc.
Source Address: 500 East State Road 28, Tipton, Indiana 46072-0337
Mailing Address: P.O. Box 337, Tipton, Indiana 46072-0337
FESOP No.: F109-12501-00005

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

December 14, 2001

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD)
for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	Ag Producer Services, Cargill, Inc.
Source Location:	500 East State Road 28, Tipton, Indiana 46072
County:	Tipton
SIC Code:	5153
Operation Permit No.:	F159-12501-00005
Permit Reviewer:	ERG/KC

On October 29, 2001, the Office of Air Quality (OAQ) had a notice published in the Tipton County Tribune, Tipton, Indiana, stating that Ag Producer Services, Cargill, Inc., had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a wholesale grain processing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 5, 2001, Ag Producer Services, Cargill, Inc. submitted comments on the proposed FESOP. The summary of the comments is as follows:

Comment 1:

The source noted that Condition C.10 (Compliance Requirements) allows IDEM to require compliance testing at anytime. The source feels that there need to be a compelling reason to require stack testing. Stack testing is expensive and time consuming to perform and the cost must be absorbed by Cargill or transferred to the consumer. The source feels that if no environmental impact has been documented, then there should be no compelling reason to require testing. The source believes that the condition as it is currently written is vague and therefore should be alter to indicate that IDEM must have a valid concern or reason to request that testing be performed.

Response to Comment 1:

It is time consuming and expensive for both the regulated and the regulator to require testing. The regulator must review test protocol, attend the test, and review the results among other things. Therefore, tests are not requested lightly. However, it is within the state's authority to ask for testing to demonstrate compliance with the permit. If the language in this condition were altered as suggested by the source, it may inadvertently limit the state's ability to request a test for a good reason not anticipated at this time. Permittees may file a formal objection with the Office of Environmental Ajudication if a specific request appears to be unreasonable. No change was made as a result of this comment.

Comment 2:

The source noted that Condition D.1.7 (Parametric Monitoring) currently states that the pressure drops across the baghouses shall be maintained between a range of 2.0 to 4.0 inches of water. The source believes this range should be 0.5 to 0.6 inches of water. The source would like for this condition to be altered to reflect the correct pressure drop.

Response to Comment 2:

IDEM has made the following change to the permit:

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the processes mentioned above, at least once per shift when the processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of **0.5**~~2.0~~ and **0.6**~~4.0~~ inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Comment 3:

The source noted that Condition D.1.6 (Visible Emission Notations), D.1.7 (Parametric Monitoring), and D.2.5 (Visible Emission Notations) require once per shift visible emission notations and once per shift pressure drops. Cargill feels that this is excessive. In Cargill's 1997 construction permit, CP159-8288-00005, they were required to perform these monitoring activities weekly. The source would like this condition to be changed to require weekly monitoring not once per shift monitoring.

Response to Comment 3:

Compliance monitoring conditions are in the permit in order to ensure compliance with the requirements. Baghouse failure can occur suddenly; therefore, monitoring of baghouse operational parameters should be more frequently than weekly or even daily. IDEM, OAQ believes that monitoring once per shift is a reasonable requirement. Additionally monitoring of the static pressure drop can alert the operator to relative changes (such as dust cake resistence) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Pressure drop is an indicator of a variety of conditions within the baghouse. Any deviation from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. Therefore, no change was made to the permit.

Comment 4:

The source noted that Condition D.1.8 (Baghouse Inspections) requires quarterly bag inspections. The source feels that this is excessive and requests that the inspections be changed to yearly. Their experience indicates that the bags generally have a life greater than 5 years. Additionally, they are monitoring pressure drops and a pressure drop of 0.0 inches of water will be an indication of bag failure.

Response to Comment 4:

The baghouses are necessary to be in compliance with 326 IAC 6-3-2, 326 IAC 2-2 and 326 IAC 2-8-4. IDEM, OAQ feels that quarterly inspections are reasonable and necessary to ensure compliance with these rules.

Comment 5:

The source noted that Condition D.1.7 (Parametric Monitoring) requires that the pressure gauge be calibrated every 6 months. The source has not experienced any problems with their pressure gauge and believes that yearly calibrations would be adequate to remain in compliance.

Response to Comment 5:

IDEM, OAQ believes that monitoring the pressure drop across the baghouse is important for determining the proper operation of the baghouses. In order to accurately measure the pressure drop, accurate pressure drop gauges must be used. IDEM feels that calibration every six months ensure accurate pressure drop readings.

Upon further review, IDEM, OAQ made the following changes to the permit:

1. In order to ensure that the reports are sent to the appropriate division, the division section for IDEM has been changed in Conditions B.12, to read as follows:

> Indiana Department of Environmental Management
> Compliance **Branch**~~Data Section~~, Office of Air Quality
> 100 North Senate Avenue, P. O. Box 6015
> Indianapolis, Indiana 46206-6015
>
> "Compliance Data Section" was deleted from the FESOP Certification.

2. Several conditions were modified by removing language stating that the condition was not federally enforceable. Federal law states that failure to comply with any permit condition issued under a program that has been approved into a State Implementation Plan (SIP) is to be treated as a violation of the SIP (40 CFR 52.23). This has the effect of making all FESOP conditions federally enforceable. Indiana's FESOP program was approved as a part of Indiana's SIP at 40 CFR 52.788. Neither the program nor the underlying rule, 326 IAC 2-8 contains provisions for designating certain conditions as not federally enforceable; therefore, IDEM, OAQ has made changes to the following conditions:

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. ~~The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.~~

3. The grain dryers limited in D.2 were accidentally included in the facility description of D.1. This was corrected as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(I) Totally enclosed grain handling from BC-7 to Tank 400 with a maximum hourly capacity of 1,200,000 pounds.

(4) System 4 using a polypropylene baghouse, identified as DS-4, for particulate control, exhausting through a stack, identified as S-4, consists of the following emission units:

(A) One (1) truck receiving area, identified as Truck Dump #2, with a maximum yearly capacity of 900,000 pounds;

(B) Grain handling from Truck Dump #2 to DC-51, with a maximum hourly capacity of 900,000 pounds; and

(C) Grain handling from DC-51 to Leg 5, with a maximum hourly capacity of 900,000 pounds.

(b) One (1) outdoor grain stockpile, identified as FS-3, with a maximum storage of one and two-tenths (1.2) million bushels of grain.

~~(c) Two (2) grain dryers, identified as emission unit ID 5 and 6, heated by natural gas, with a heat input rate of forty five (45) million Btu (MMBtu) per hour, exhausting through one (1) stack each, identified as S-5 and S-6, respectively.~~

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	Ag Producer Services, Cargill, Inc.
Source Location:	500 East State Road 28, Tipton, Indiana 46072
County:	Tipton
SIC Code:	5153
Operation Permit No.:	F 159-12501-00005
Permit Reviewer:	ERG/KC

The Office of Air Quality (OAQ) has reviewed a FESOP application from Ag Producer Services, Cargill, Inc., relating to the operation of wholesale grain processing.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Four (4) grain elevator systems, identified as emission units ID 1, 2, 3, and 4, with a maximum total rate of forty (40) million bushels of grain per year, using a polypropylene baghouse each for control, exhausting through four (4) stacks, identified as S-1, S-2, S-3, and S-4. The four systems are:

(1) System 1, using a polypropylene baghouse, identified as DS-1, for particulate control, exhausting through a stack, identified as S-1, consists of the following emission units:

(A) One (1) truck receiving area, identified as Truck Dump #1, with a maximum hourly capacity of 1,200,000 pounds;

(B) Grain handling from Truck Dump #1 to Belt Con (BC-1), with a maximum hourly capacity of 1,200,000 pounds;

(C) Grain handling from BC-1 to Leg 1 with a maximum hourly capacity of 1,200,000 pounds;

(D) Grain handling from DC-1 to Leg 3, with a maximum hourly capacity of 600,000 pounds;

(E) Grain handling from BC-1 to Leg 4, with a maximum hourly capacity of 600,000 pounds;

(F) Grain handling from Leg 3 to Dryer #2, with a maximum hourly capacity of 600,000 pounds;

(G) Grain handling from Dryer #2 to DC-2, with a maximum hourly capacity of 600,000 pounds;

(H) Grain handling from Leg 3 to DC-3, with a maximum hourly capacity of 600,000 pounds;

(I) Grain handling from Dryer #1 to DC-3, with a maximum hourly capacity of 600,000 pounds;

(J) Grain handling from DC-2 to Leg 4, with a maximum hourly capacity of 600,000 pounds;

(2) System 2, using a polypropylene baghouse, identified as DS-2, for particulate control, exhausting through a stack, identified as S-2, consists of the following emission units:

(A) Grain handling from Leg 1 to Rail loadout, with a maximum hourly capacity of 1,200,000 pounds;

(B) Grain handling from Leg 1 to Bins, with a maximum hourly capacity of 1,200,000 pounds;

(C) Grain handling from Leg 1 to BC-2 with a maximum hourly capacity of 1,200,000 pounds;

(D) Grain handling from Leg 4 to DC-3, with a maximum hourly capacity of 600,000 pounds;

(E) Grain handling from DC-3 to Bins, with a maximum hourly capacity of 600,000 pounds;

(F) Grain handling from DC-3 to DC-4 with a maximum hourly capacity of 600,000 pounds;

(G) Grain handling from Leg 4 to BC-2, with a maximum hourly capacity of 600,000 pounds;

(H) Grain handling from Leg 4 to Bins, with a maximum hourly capacity of 600,000 pounds;

(I) Grain handling from Leg 5 to Bins, with a maximum hourly capacity of 900,000 pounds;

(J) Grain handling from Leg 5 to BC-6, with a maximum hourly capacity of 900,000 pounds;

(K) Grain handling from DC-6 to BC-7, with a maximum hourly capacity of 1,200,000 pounds;

(L) Grain handling from BC-7 to Bins, with a maximum hourly capacity of 1,200,000 pounds;

(M) Grain handling from Leg 5 to BC-4, with a maximum hourly capacity of 900,000 pounds;

(N) Grain handling from Bins to DC-1, with a maximum hourly capacity of 600,000 pounds;

(O) Grain handling from BC-2 to Bins with a maximum hourly capacity of 1,200,000 pounds;

(P) Grain handling from BC-2 to BC-3 with a maximum hourly capacity of 1,200,000 pounds;

(Q) Grain handling from BC-3 to Bins, with a maximum hourly capacity of 1,200,000 pounds;

(R) Grain handling from Tank 100 to BC-11, with a maximum hourly capacity of 2,400,000 pounds;

(S) Grain handling from Tank 200 to BC-11 with a maximum hourly capacity of 2,400,000 pounds;

(T) Totally enclosed grain handling from Tank 300 to BC-12 with a maximum hourly capacity of 2,400,000 pounds;

(U) Totally enclosed grain handling from Tank 400 to BC-12 with a maximum hourly capacity of 2,400,000 pounds;

(V) Totally enclosed grain handling from BC-12 to BC-11 with a maximum hourly capacity of 2,400,000 pounds;

(W) Totally enclosed grain handling from BC-11 to BC-10 with a maximum hourly capacity of 2,400,000 pounds;

(X) Grain handling from Bins to BC-10 with a maximum hourly capacity of 2,400,000 pounds;

(Y) Grain handling from BC-10 to Leg 1 with a maximum hourly capacity of 1,200,000 pounds;

(Z) Grain handling from BC-10 to Leg 2 with a maximum hourly capacity of 1,200,000 pounds;

(AA) Grain handling from Leg 2 to Scales with a maximum hourly capacity of 1,200,000 pounds;

(BB) Grain handling from Scales to Rail Loadout with a maximum hourly capacity of 250,192 pounds; and

(CC) Grain handling from Shipping to Rail Loadout, with a maximum hourly capacity of 2,400,000 pounds.

(3) System 3, using a polypropylene baghouse, identified as DS-3, for particulate control, exhausting through a stack identified as S-3, consists of the following emission units:

(A) Grain handling from DC-4 to Tank 100, with a maximum hourly capacity of 600,000 pounds;

(B) Grain handling from BC-3 to BC-4 with a maximum hourly capacity of 1,200,000 pounds;

(C) Grain handling from BC-4 to Tank 100 with a maximum hourly capacity of 1,200,000 pounds;

(D) Totally enclosed grain handling from BC-4 to BC-5 with a maximum hourly capacity of 1,200,000 pounds;

(E) Totally enclosed grain handling from BC-5 to Tank 200 with a maximum hourly capacity of 1,200,000 pounds;

(F) Totally enclosed grain handling from BC-5 to BC-6 with a maximum hourly capacity of 1,200,000 pounds;

(G) Totally enclosed grain handling from BC-6 to Tank 300 with a maximum hourly capacity of 1,200,000 pounds;

(H) Totally enclosed grain handling from BC-6 to BC-7 with a maximum hourly capacity of 1,200,000 pounds; and

(I) Totally enclosed grain handling from BC-7 to Tank 400 with a maximum hourly capacity of 1,200,000 pounds.

(4) System 4 using a polypropylene baghouse, identified as DS-4, for particulate control, exhausting through a stack, identified as S-4, consists of the following emission units:

(A) One (1) truck receiving area, identified as Truck Dump #2, with a maximum yearly capacity of 900,000 pounds;

(B) Grain handling from Truck Dump #2 to DC-51, with a maximum hourly capacity of 900,000 pounds; and

(C) Grain handling from DC-51 to Leg 5, with a maximum hourly capacity of 900,000 pounds.

(b) One (1) outdoor grain stockpile, identified as FS-3, with a maximum storage of one and two-tenths (1.2) million bushels of grain.

(c) Two (2) grain dryers, identified as emission unit ID 5 and 6, heated by natural gas, with a heat input rate of forty five (45) million Btu (MMBtu) per hour, exhausting through one (1) stack each, identified as S-5 and S-6, respectively.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new emission units and pollution control equipment receiving new source review approval at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;

(b) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;

(c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(d) Paved and unpaved roads and parking lots with public access; and

(e) Underground conveyors.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP-159-8288-00005, issued on 10/1/97; and

(b) CP-159-3657-00005, issued on 7/15/94.

All conditions from previous approvals were incorporated into this FESOP except:

CP-159-8288-00005, issued on 10/1/97 states that the polypropylene baghouses are integral to each of the grain elevator processes. However, after further investigation, IDEM, OAQ decided that the baghouses were not integral as discussed below.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the polypropylene baghouse be considered as an integral part in each of the grain elevator systems.

(a) The control device is hard-wired to the process such that the control device is activated when ever the process is activated.

(b) The control devices are in place to meet OSHA requirements.

(c) The control devices are used for capturing the product marketed by the facility.

(d) Ag Producer Services will maintain proper operation of control device.

IDEM, OAQ has evaluated the justifications and determined that the polypropylene baghouse will not be considered as an integral part of the grain elevator systems. This decision is based upon the fact that a hard-wired device can be disconnected at any time and because OSHA rules can be changed at anytime. The source did not provide information supporting whether a significant amount of product is captured by the baghouses to warrant deeming the baghouses as integral to the process. Therefore, the permitting level will be determined using the potential to emit before the polypropylene baghouse.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on July 19, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 11.)

Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

The source has chosen to limit the grain elevators to forty million (40,000,000) bushels of grain per 12-month period, based on a monthly rolling total. This will limit the PM10 emissions to less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. Because the maximum process rate is difficult to determine, the potential to emit for the source were established based on this limit.

Pollutant	Potential To Emit (tons/year)
PM	467.19
PM-10	236.94
SO_2	0.24
VOC	2.16
CO	33.12
NO_x	39.42

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Benzene	8.28×10^{-4}
Dichlorobenzene	4.73×10^{-4}
Formaldehyde	2.96×10^{-2}
Hexane	7.10×10^{-1}
Toluene	1.34×10^{-3}
Lead	1.97×10^{-4}
Cadmium	4.34×10^{-4}
Chromium	5.52×10^{-4}
Manganese	1.50×10^{-4}
Nickel	8.28×10^{-4}
TOTAL	7.44×10^{-4}

(a) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance

Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/Facility	Potential to Emit (ton/yr)						
	PM	PM10	SO2	VOC	CO	NOx	HAPs
Receiving							
Truck Dump #1	0.12	0.026	0	0	0	0	0
Truck Dump #2	0.077	0.017	0	0	0	0	0
Handling							
Truck Dump #1 to BC-1	0.2	0.11	0	0	0	0	0
BC-1 to Leg 1	0.15	0.084	0	0	0	0	0
DC-1 to Leg 3 (see dryers)	0.038	0.021	0	0	0	0	0
Leg 1 to Rail Loadout (see loadout)	0.01	0.006	0	0	0	0	0
Leg 1 to Bins	0.051	0.029	0	0	0	0	0
Leg 1 to BC-2 (see transfer)	0.051	0.029	0	0	0	0	0
BC-1 to Leg 4 (25% of grain received)	0.05	0.028	0	0	0	0	0
Leg 4 to DC-3 (includes dryer recycle)	0.052	0.029	0	0	0	0	0
DC-3 to Bins	0.042	0.023	0	0	0	0	0
DC-3 to DC-4	0.01	0.006	0	0	0	0	0
DC-4 to Tank 100 (20% of grain received)	0.01	0.006	0	0	0	0	0
Leg 4 to BC-2 (includes dryer recycle)	0.052	0.029	0	0	0	0	0
Leg 4 to Bins (includes dryer recycle)	0.052	0.029	0	0	0	0	0
Truck Dump #2 to DC-5	0.13	0.075	0	0	0	0	0
DC-5 to Leg 5	0.13	0.075	0	0	0	0	0
Leg 5 to Bins (45% of grain received)	0.06	0.034	0	0	0	0	0
Leg 5 to BC-6 (45% of grain received)	0.06	0.03	0	0	0	0	0
DC-6 to BC-7	0.06	0.034	0	0	0	0	0
BC-7 to Bins	0.027	0.015	0	0	0	0	0
DC-1 to Leg 3 (see dryers)	0.033	0.019	0	0	0	0	0
Leg 5 to BC-4 (see transfers)	0.013	0.007	0	0	0	0	0
Bins to DC-1	0.035	0.02	0	0	0	0	0
DC-1 to Leg 3	0.106	0.059	0	0	0	0	0

Process/Facility	Potential to Emit (ton/yr)						
	PM	PM10	SO2	VOC	CO	NOx	HAPs
Leg 3 to Dryer #2	0.053	0.03	0	0	0	0	0
Dryer #2 to DC-2	0.053	0.03	0	0	0	0	0
Leg 3 to DC-3	0.053	0.03	0	0	0	0	0
Dryer #1 to DC-3	0.053	0.03	0	0	0	0	0
DC-2 to Leg 4 (see receiving)	0.11	0.059	0	0	0	0	0
BC-2 to Bins	0.004	0.002	0	0	0	0	0
BC-2 to BC-3	0.099	0.055	0	0	0	0	0
BC-3 to Bins	0.004	0.002	0	0	0	0	0
BC-3 to BC-4	0.095	0.053	0	0	0	0	0
BC-4 to Tank 100	0.015	0.008	0	0	0	0	0
BC-4 to BC-5	0.08	0.045	0	0	0	0	0
BC-5 to Tank 200	0.025	0.014	0	0	0	0	0
BC-5 to BC-6	0.055	0.031	0	0	0	0	0
BC-6 to Tank 300	0.025	0.014	0	0	0	0	0
BC-6 to BC-7	0.03	0.017	0	0	0	0	0
BC-7 to Tank 400	0.03	0.017	0	0	0	0	0
Tank 100 to BC-11	0.025	0.014	0	0	0	0	0
Tank 200 to BC-11	0.025	0.014	0	0	0	0	0
Tank 300 to BC-12	0.025	0.014	0	0	0	0	0
Tank 400 to BC-12	0.03	0.017	0	0	0	0	0
BC-12 to BC-11	0.055	0.031	0	0	0	0	0
BC-11 to BC-10	0.11	0.059	0	0	0	0	0
Bins to BC-10 (+10% recycle)	0.25	0.14	0	0	0	0	0
BC-10 to Leg 1 (10% recycle)	0.023	0.013	0	0	0	0	0
BC-10 to Leg 2 (see loadout)	0.33	0.19	0	0	0	0	0
Leg 2 to Scales	0.33	0.19	0	0	0	0	0
Scales to Rail Loadout	0.33	0.19	0	0	0	0	0
Drying							
Dryer #1	19.58	6.02	0.12	1.08	16.56	19.71	0
Dryer #2	19.58	6.02	0.12	1.08	16.56	19.71	0
Shipping							
Rail Loadout	0.15	0.012	0	0	0	0	0
Total	43.42	14.31	0.24	2.16	33.12	39.42	0.00

County Attainment Status

The source is located in Tipton County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment

Pollutant	Status
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Tipton County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) Truck Dump #1 is not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60, Subpart DD (Standards of Performance for Grain Elevators), as it was constructed before the applicability date of August 3, 1978.

Truck Dump #2 is subject to the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60, Subpart DD (Standards of Performance for Grain Elevators). The source operates a grain elevator with a storage capacity greater than one (1) million bushels. Therefore, the rule applies.

Based on the plate performance diameter of 0.078 inches for Grain Dryer #1 and Grain Dryer #2 there are no requirements specific to the column grain dryers, because the grain dryer requirements of 40 CFR 60.302(a) only apply to plate performance diameters greater than 0.094 inches.

The rule requires the following:

(1) On or after the date on which the performance test required to be conducted under 40 CFR 60.8 is completed, Ag Producer Services shall not cause to be discharged into the atmosphere from grain elevator stacks 1-3 any process emission which:

(A) Contains particulate matter in excess of 0.023 grains per dry standard cubic meter (ca. 0.01 grains per dry standard cubic foot); and

(B) Exhibits greater than zero (0) percent opacity.

(2) On and after the 60th day of achieving the maximum production rate at which the grain elevators will be operated, but no later than 180 days after initial startup, Ag Producers Services shall not cause to be discharged into the atmosphere any fugitive emissions from:

(A) Any individual truck unloading station, railcar unloading station, or rail car loading station which exhibits greater than five (5) percent opacity;

(B) Any grain handling operation which exhibits greater than zero (0) percent opacity; and

(C) Any truck loading station that exhibits greater than ten (10) percent opacity.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on July 19, 2000.

326 IAC 2-6 (Emission Reporting)

This source is located in Tipton County and the potential to emit PM and PM10 is limited to less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-8-4 (FESOP)

The grain elevators shall be limited to forty million (40,000,000) bushels of grain per 12 consecutive month period. The source shall be limited to PM10 emissions of 0.0078 pounds per ton of grain for receiving units, 0.034 pounds per ton of grain for handling units, 0.055 pounds per ton of grain for drying units, and 0.0022 pounds per ton of grain for shipping units. These limitations are equivalent to limiting PM10 emissions to less than one hundred (100) tons per year (22.83 lb/hr). Compliance with these limits and the use of baghouses make 326 IAC 2-7 (Part 70 Permit program) not applicable.

326 IAC 2-2 (Prevention of Significant Deterioration)

The grain elevators shall be limited to forty million (40,000,000) bushels of grain per 12 consecutive month period. The source shall be limited to PM emissions of 0.035 pounds per ton of grain for receiving units, 0.61 pounds per ton of grain for handling units, 0.22 pounds per ton of grain for drying units, and 0.027 for the shipping units. These limitations are equivalent to limiting PM emissions to less than two hundred fifty (250) tons per year. Compliance with these limits and the use of the baghouses makes 326 IAC 2-2 and 40 CFR 52.21, not applicable.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property, right of way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the receiving, handling, drying, and shipping facilities shall be limited to the potential controlled emissions as reported below:

Process/Facility	Process Weight Rate (lb/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
Receiving			
Truck Dump #1	1,200,000	600	71.16
Truck Dump #2	900,000	450	67.70

Process/Facility	Process Weight Rate (lb/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
Handling			
Truck Dump #1 to BC-1	1,200,000	600	71.16
BC-1 to Leg 1	1,200,000	600	71.16
DC-1 to Leg 3 (see dryers)	600,000	300	63.00
Leg 1 to Rail Loadout (see loadout)	1,200,000	600	71.16
Leg 1 to Bins	1,200,000	600	71.16
Leg 1 to BC-2 (see transfer)	1,200,000	600	71.16
BC-1 to Leg 4 (25% of grain received)	600,000	300	63.00
Leg 4 to DC-3 (includes dryer recycle)	600,000	300	63.00
DC-3 to Bins	600,000	300	63.00
DC-3 to DC-4	600,000	300	63.00
DC-4 to Tank 100 (20% of grain received)	600,000	300	63.00
Leg 4 to BC-2 (includes dryer recycle)	600,000	300	63.00
Leg 4 to Bins (includes dryer recycle)	600,000	300	63.00
Truck Dump #2 to DC-51	900,000	450	67.70
DC-51 to Leg 5	900,000	450	67.70
Leg 5 to Bins (45% of grain received)	900,000	450	67.70
Leg 5 to BC-6 (45% of grain received)	900,000	450	67.70
DC-6 to BC-7	1,200,000	600	71.16
BC-7 to Bins	1,200,000	600	71.16
DC-1 to Leg 3 (see dryers)	600,000	300	63.00
Leg 5 to BC-4 (see transfers)	900,000	450	67.70
Bins to DC-1	600,000	300	63.00
DC-1 to Leg 3	600,000	300	63.00
Leg 3 to Dryer #2	600,000	300	63.00
Dryer #2 to DC-2	600,000	300	63.00
Leg 3 to DC-3	600,000	300	63.00
Dryer #1 to DC-3	600,000	300	63.00
DC-2 to Leg 4 (see receiving)	600,000	300	63.00
BC-2 to Bins	1,200,000	600	71.16
BC-2 to BC-3	1,200,000	600	71.16
BC-3 to Bins	1,200,000	600	71.16
BC-3 to BC-4	1,200,000	600	71.16
BC-4 to Tank 100	1,200,000	600	71.16
BC-4 to BC-5	1,200,000	600	71.16
BC-5 to Tank 200	1,200,000	600	71.16
BC-5 to BC-6	1,200,000	600	71.16
BC-6 to Tank 300	1,200,000	600	71.16
BC-6 to BC-7	1,200,000	600	71.16

Process/Facility	Process Weight Rate (lb/hr)	Process Weight Rate (ton/hr)	Emission Rate (lb/hr)
BC-7 to Tank 400	1,200,000	600	71.16
Tank 100 to BC-11	2,400,000	1,200	79.97
Tank 200 to BC-11	2,400,000	1,200	79.97
Tank 300 to BC-12	2,400,000	1,200	79.97
Tank 400 to BC-12	2,400,000	1,200	79.97
BC-12 to BC-11	2,400,000	1,200	79.97
BC-11 to BC-10	2,400,000	1,200	79.97
Bins to BC-10 (+10% recycle)	2,400,000	1,200	79.97
BC-10 to Leg 1 (10% recycle)	1,200,000	600	71.16
BC-10 to Leg 2 (see loadout)	1,200,000	600	71.16
Leg 2 to Scales	1,200,000	600	71.16
Scales to Rail Loadout	250,192	125.10	53.55
Shipping			
Rail Loadout	2,400,000	1,200	79.97

These limitations were based on the following equations:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The baghouses shall be in operation at all times these facilities are in operation, in order to comply with this limit.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not

grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The grain elevator systems and grain dryers has applicable compliance monitoring conditions as specified below:

   (a) Once per shift visible emissions notations of the grain elevator systems and grain dryers shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

   (b) The Permittee shall record the total static pressure drop across the baghouses controlling the grain elevator systems at least once daily when the grain elevator systems are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 2.6 to 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

   These monitoring conditions are necessary because the baghouse for the grain elevator systems process must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this wholesale grain processing source shall be subject to the conditions of the attached proposed FESOP No. F159-12501-00005.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler - Grain Dryer # 1 (S-5)

Company Name: Ag Producer Services, Cargill, Inc.
Address City IN Zip: 500 East State Road 28, Tipton, IN 46072
CP: 159-12501-00005
Plt ID: 159-12501-00005
Reviewer: ERG/RGO
Date: 09/07/00

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
45.000	394.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	1.50	1.50	0.12	19.71	1.08	16.56

*PM and PM10 emission factors are combined filterable and condensable PM and PM10 respectively.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler - Grain Dryer # 1 (S-5)
HAPs Emissions

Company Name: Ag Producer Services, Cargill, Inc.
Address City IN Zip: 500 East State Road 28, Tipton, IN 46072
CP: 159-12501-00005
Plt ID: 159-12501-00005
Reviewer: ERG/RGO
Date: 09/07/00

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.139E-04	2.365E-04	1.478E-02	3.548E-01	6.701E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	9.855E-05	2.168E-04	2.759E-04	7.490E-05	4.139E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler - Grain Dryer # 2 (S-6)

Company Name: Ag Producer Services, Cargill, Inc.
Address City IN Zip: 500 East State Road 28, Tipton, IN 46072
CP: 159-12501-00005
Plt ID: 159-12501-00005
Reviewer: ERG/RGO
Date: 09/07/00

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
45.000	394.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	1.50	1.50	0.12	19.71	1.08	16.56

*PM and PM10 emission factors are combined filterable and condensable PM and PM10 respectively.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler - Grain Dryer # 2 (S-6)
HAPs Emissions

Company Name: Ag Producer Services, Cargill, Inc.
Address City IN Zip: 500 East State Road 28, Tipton, IN 46072
CP: 159-12501-00005
Plt ID: 159-12501-00005
Reviewer: ERG/RGO
Date: 09/07/00

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.139E-04	2.365E-04	1.478E-02	3.548E-01	6.701E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	9.855E-05	2.168E-04	2.759E-04	7.490E-05	4.139E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Grain Elevator

Small Country Terminal Elevator (Receiving)

Company Name: Ag Producer Services, Cargill, Inc.

Address City IN Zip: 500 East State Road 28, Tipton, IN 46072

CP: 159-12501-00005

Plt ID: 159-12501-00005

Reviewer: ERG/RGO

Date: 09/07/00

ACTUAL HOURS OF OPERATION	
Hours per day:	24
Days per week:	7
Weeks per year:	52
HOURS PER YEAR:	8760

Limited Potential Scenario	Proposed	% Contribution
Truck Dump#1	23,280,000	58%
Truck Dump#2	15,520,000	39%
Asphalt Pad	1,200,000	3%
	40,000,000	

BUSHELS PER YEAR	Actual	% Cont	Limited Potential (bushels)	Conversion	Limited Potential (tons)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,880,000	29.364%	11,745,625	56	328,878
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Total	**23,430,000**	**100%**	**40,000,000**		**1,129,731**

Emission Point	Emission Process	Processing Rate (tpy)	Processing Rate (pound per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions (tpy)	Control Efficiency (%)	Controlled PM Emissions (tpy)	PM-10 Emissions (tpy)
Truck Dump #1	Receiving	657,504	150,115	0.035	11.506	0.0078	2.564	99.00%	0.115	0.026
Truck Dump #2	Receiving	438,336	100,077	0.035	7.671	0.0078	1.710	99.00%	0.077	0.017
	TOTAL =	1,095,839			**19.177**		**4.274**		**0.192**	**0.043**

Methodology

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate * Emission Factor / 2000 (lbs/ton)

AP 42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest season. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export. These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.

Appendix A: Emissions Calculations

Grain Elevator

Small Country Terminal Elevator (Handling)

Company Name: Ag Producer Services, Cargill, Inc.

Address City IN Zip: 500 East State Road 28, Tipton, IN 46072

CP: 159-12501-00005

Plt ID: 159-12501-00005

Reviewer: ERG/RGO

Date: 09/07/00

ACTUAL HOURS OF OPERATION	
Hours per day:	24
Days per week:	7
Weeks per year:	52
HOURS PER YEAR:	8760

Limited Potential Scenario	Proposed	% Contribution
Truck Dump#1	23,280,000	58%
Truck Dump#2	15,520,000	39%
Asphalt Pad	1,200,000	3%
	40,000,000	

BUSHELS PER YEAR	Actual	% Cont	Limited Potential	Conversion (lb/bushel)	Potential (tons per year)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,880,000	29.364%	11,745,625	56	328,878
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Total	**23,430,000**	**100%**	**40,000,000**		**1,129,731**

PM Emissions from Handling

Emission Point	Processing Rate in tons (tpy)	Processing Rate (pound per hour)	PM Emission Factor (lb/ton)	PM Emissions (tpy)	Control Efficiency (%)	Controlled PM Emissions (tpy)
Truck Dump #1 to BC1	657,504	150,115	0.061	20.054	99.00%	0.201
BC1 to Leg 1	493,128	112,586	0.061	15.040	99.00%	0.150
Leg 1 to DC1 (25% direct to dryers)	123,282	28,147	0.061	3.760	99.00%	0.038
DC1 to Leg 3 (see dryers)	123,282	28,147	0.061	3.760	99.00%	0.038
Leg 1 to Rail Loadout (see loadout)	33,892	7,738	0.061	1.034	99.00%	0.010
Leg 1 to Bins	167,977	38,351	0.061	5.123	99.00%	0.051
Leg 1 to BC2 (see transfer)	167,977	38,351	0.061	5.123	99.00%	0.051
BC1 to Leg 4 (25% of grain received)	164,376	37,529	0.061	5.013	99.00%	0.050
Leg 4 to DC3 (includes dryer recycle)	171,019	39,045	0.061	5.216	99.00%	0.052
DC3 to Bins	136,815	31,236	0.061	4.173	99.00%	0.042
DC3 to DC4	34,204	7,809	0.061	1.043	99.00%	0.010
DC4 to Tank 100 (20% of DC3)	34,204	7,809	0.061	1.043	99.00%	0.010
Leg 4 to BC2 (includes dryer recycle)	171,019	39,045	0.061	5.216	99.00%	0.052
Leg 4 to Bins (includes dryer recycle)	171,019	39,045	0.061	5.216	99.00%	0.052
Truck Dump #2 to DC5	438,336	100,077	0.061	13.369	99.00%	0.134
DC5 to Leg 5	438,336	100,077	0.061	13.369	99.00%	0.134
Leg 5 to Bins (45% of grain received)	197,251	45,034	0.061	6.016	99.00%	0.060

Appendix A: Emissions Calculations

Grain Elevator

Small Country Terminal Elevator (Handling)

Company Name: Ag Producer Services, Cargill, Inc.

Address City IN Zip: 500 East State Road 28, Tipton, IN 46072

CP: 159-12501-00005

Plt ID: 159-12501-00005

Reviewer: ERG/RGO

Date: 09/07/00

PM Emissions from Handling (cont.)

Emission Point	Processing Rate in tons (tpy)	Processing Rate (pound per hour)	PM Emission Factor (lb/ton)	PM Emissions (tpy)	Control Efficiency (%)	Controlled PM Emissions (tpy)
Leg 5 to DC6 (45% of grain received)	197,251	45,034	0.061	6.016	99.00%	0.060
DC6 to DC7	197,251	45,034	0.061	6.016	99.00%	0.060
DC7 to Bins	87,667	20,015	0.061	2.674	99.00%	0.027
DC7 to DC1 (25% direct to dryers)	109,584	25,019	0.061	3.342	99.00%	0.033
DC1 to Leg 3 (see dryers)	109,584	25,019	0.061	3.342	99.00%	0.033
Leg 5 to BC4 (see transfers)	43,834	10,008	0.061	1.337	99.00%	0.013
Bins to DC1	115,817	26,442	0.061	3.532	99.00%	0.035
DC1 to Leg 3	348,683	79,608	0.061	10.635	99.00%	0.106
Leg 3 to Dryer #2	174,341	39,804	0.061	5.317	99.00%	0.053
Dryer #2 to DC2	174,341	39,804	0.061	5.317	99.00%	0.053
Leg 3 to DC8	174,341	39,804	0.061	5.317	99.00%	0.053
DC8 to Dryer #1	174,341	39,804	0.061	5.317	99.00%	0.053
Dryer #1 to DC9	174,341	39,804	0.061	5.317	99.00%	0.053
DC9 to DC2	174,341	39,804	0.061	5.317	99.00%	0.053
DC2 to Leg 4 (see receiving)	348,683	79,608	0.061	10.635	99.00%	0.106
BC2 to Bins	14,006	3,198	0.061	0.427	99.00%	0.004
BC2 to BC3	324,990	74,199	0.061	9.912	99.00%	0.099
BC3 to Bins	14,006	3,198	0.061	0.427	99.00%	0.004
BC3 to BC4	310,984	71,001	0.061	9.485	99.00%	0.095
BC4 to Tank 100	47,985	10,955	0.061	1.464	99.00%	0.015
BC4 to BC5	262,999	60,046	0.061	8.021	99.00%	0.080
BC5 to Tank 200	82,187	18,764	0.061	2.507	99.00%	0.025
BC5 to BC6	180,812	41,281	0.061	5.515	99.00%	0.055
BC6 to Tank 300	82,188	18,764	0.061	2.507	99.00%	0.025
BC6 to BC7	98,624	22,517	0.061	3.008	99.00%	0.030
BC7 to Tank 400	98,624	22,517	0.061	3.008	99.00%	0.030
Tank 100 to BC11	82,189	18,765	0.061	2.507	99.00%	0.025
Tank 200 to BC11	82,187	18,764	0.061	2.507	99.00%	0.025
Tank 300 to BC12	82,188	18,764	0.061	2.507	99.00%	0.025
Tank 400 to BC12	98,624	22,517	0.061	3.008	99.00%	0.030
BC12 to BC11	180,812	41,281	0.061	5.515	99.00%	0.055
BC11 to BC10	345,188	78,810	0.061	10.528	99.00%	0.105
Bins to BC10 (+10% recycle)	825,714	188,519	0.061	25.184	99.00%	0.252
BC10 to Leg 1 (10% recycle)	75,066	17,138	0.061	2.290	99.00%	0.023
BC10 to Leg 2 (see loadout)	1,095,840	250,192	0.061	33.423	99.00%	0.334
Leg 2 to Scales	1,095,840	250,192	0.061	33.423	99.00%	0.334
Scales to Rail Loadout	1,095,840	250,192	0.061	33.423	99.00%	0.334
	TOTAL PM Emissions =			**393.600**		**3.936**

Appendix A: Emissions Calculations

Grain Elevator

Small Country Terminal Elevator (Handling)

Company Name: Ag Producer Services, Cargill, Inc.

Address City IN Zip: 500 East State Road 28, Tipton, IN 46072

CP: 159-12501-00005

Plt ID: 159-12501-00005

Reviewer: ERG/RGO

Date: 09/07/00

PM10 Emissions from Handling

Emission Point	Processing Rate in tons (tpy)	Processing Rate (pound per hour)	PM10 Emission Factor (lb/ton)	PM10 Emissions (tpy)	Control Efficiency (%)	PM-10 Emissions (tpy)
Truck Dump #1 to BC1	657,504	150,115	0.034	11.178	99.00%	0.112
BC1 to Leg 1	493,128	112,586	0.034	8.383	99.00%	0.084
Leg 1 to DC1 (25% direct to dryers)	123,282	28,147	0.034	2.096	99.00%	0.021
DC1 to Leg 3 (see dryers)	123,282	28,147	0.034	2.096	99.00%	0.021
Leg 1 to Rail Loadout (see loadout)	33,892	7,738	0.034	0.576	99.00%	0.006
Leg 1 to Bins	167,977	38,351	0.034	2.856	99.00%	0.029
Leg 1 to BC2 (see transfer)	167,977	38,351	0.034	2.856	99.00%	0.029
BC1 to Leg 4 (25% of grain received)	164,376	37,529	0.034	2.794	99.00%	0.028
Leg 4 to DC3 (includes dryer recycle)	171,019	39,045	0.034	2.907	99.00%	0.029
DC3 to Bins	136,815	31,236	0.034	2.326	99.00%	0.023
DC3 to DC4	34,204	7,809	0.034	0.581	99.00%	0.006
DC4 to Tank 100 (20% of DC3)	34,204	7,809	0.034	0.581	99.00%	0.006
Leg 4 to BC2 (includes dryer recycle)	171,019	39,045	0.034	2.907	99.00%	0.029
Leg 4 to Bins (includes dryer recycle)	171,019	39,045	0.034	2.907	99.00%	0.029
Truck Dump #2 to DC5	438,336	100,077	0.034	7.452	99.00%	0.075
DC5 to Leg 5	438,336	100,077	0.034	7.452	99.00%	0.075
Leg 5 to Bins (45% of grain received)	197,251	45,034	0.034	3.353	99.00%	0.034
Leg 5 to DC6 (45% of grain received)	197,251	45,034	0.034	3.353	99.00%	0.034
DC6 to DC7	197,251	45,034	0.034	3.353	99.00%	0.034
DC7 to Bins	87,667	20,015	0.034	1.490	99.00%	0.015
DC7 to DC1 (25% direct to dryers)	109,584	25,019	0.034	1.863	99.00%	0.019
DC1 to Leg 3 (see dryers)	109,584	25,019	0.034	1.863	99.00%	0.019
Leg 5 to BC4 (see transfers)	43,834	10,008	0.034	0.745	99.00%	0.007
Bins to DC1	115,817	26,442	0.034	1.969	99.00%	0.020
DC1 to Leg 3	348,683	79,608	0.034	5.928	99.00%	0.059
Leg 3 to Dryer #2	174,341	39,804	0.034	2.964	99.00%	0.030
Dryer #2 to DC2	174,341	39,804	0.034	2.964	99.00%	0.030
Leg 3 to DC8	174,341	39,804	0.034	2.964	99.00%	0.030
DC8 to Dryer #1	174,341	39,804	0.034	2.964	99.00%	0.030
Dryer #1 to DC9	174,341	39,804	0.034	2.964	99.00%	0.030
DC9 to DC2	174,341	39,804	0.034	2.964	99.00%	0.030
DC2 to Leg 4 (see receiving)	348,683	79,608	0.034	5.928	99.00%	0.059
BC2 to Bins	14,006	3,198	0.034	0.238	99.00%	0.002
BC2 to BC3	324,990	74,199	0.034	5.525	99.00%	0.055
BC3 to Bins	14,006	3,198	0.034	0.238	99.00%	0.002
BC3 to BC4	310,984	71,001	0.034	5.287	99.00%	0.053

Appendix A: Emissions Calculations
Grain Elevator
Small Country Terminal Elevator (Handling)
Company Name: Ag Producer Services, Cargill, Inc.
Address City IN Zip: 500 East State Road 28, Tipton, IN 46072
CP: 159-12501-00005
Plt ID: 159-12501-00005
Reviewer: ERG/RGO
Date: 09/07/00

PM10 Emissions from Handling (cont.)

Emission Point	Processing Rate in tons (tpy)	Processing Rate (pound per hour)	PM 10 Emission Factor (lb/ton)	PM10 Emissions (tpy)	Control Efficiency (%)	PM-10 Emissions (tpy)
BC4 to Tank 100	47,985	10,955	0.034	0.816	99.00%	0.008
BC4 to BC5	262,999	60,046	0.034	4.471	99.00%	0.045
BC5 to Tank 200	82,187	18,764	0.034	1.397	99.00%	0.014
BC5 to BC6	180,812	41,281	0.034	3.074	99.00%	0.031
BC6 to Tank 300	82,188	18,764	0.034	1.397	99.00%	0.014
BC6 to BC7	98,624	22,517	0.034	1.677	99.00%	0.017
BC7 to Tank 400	98,624	22,517	0.034	1.677	99.00%	0.017
Tank 100 to BC11	82,189	18,765	0.034	1.397	99.00%	0.014
Tank 200 to BC11	82,187	18,764	0.034	1.397	99.00%	0.014
Tank 300 to BC12	82,188	18,764	0.034	1.397	99.00%	0.014
Tank 400 to BC12	98,624	22,517	0.034	1.677	99.00%	0.017
BC12 to BC11	180,812	41,281	0.034	3.074	99.00%	0.031
BC11 to BC10	345,188	78,810	0.034	5.868	99.00%	0.059
Bins to BC10 (+10% recycle)	825,714	188,519	0.034	14.037	99.00%	0.140
BC10 to Leg 1 (10% recycle)	75,066	17,138	0.034	1.276	99.00%	0.013
BC10 to Leg 2 (see loadout)	1,095,840	250,192	0.034	18.629	99.00%	0.186
Leg 2 to Scales	1,095,840	250,192	0.034	18.629	99.00%	0.186
Scales to Rail Loadout	1,095,840	250,192	0.034	18.629	99.00%	0.186
	TOTAL PM10 Emissions =			**219.383**		**2.194**

Methodology

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate * Emission Factor / 2000 (lbs/ton)

AP 42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest season. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export. These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.

Appendix A: Emissions Calculations

Grain Elevator

Small Country Terminal Elevator (Drying)

Company Name: Ag Producer Services, Cargill, Inc.
Address City IN Zip: 500 East State Road 28, Tipton, IN 46072
CP: 159-12501-00005
Plt ID: 159-12501-00005
Reviewer: ERG/RGO
Date: 09/07/00

ACTUAL HOURS OF OPERATION	
Hours per day:	24
Days per week:	7
Weeks per year:	52
HOURS PER YEAR:	8760

Limited Potential Scenario	Proposed	% Contribution
Truck Dump#1	23,280,000	58%
Truck Dump#2	15,520,000	39%
Asphalt Pad	1,200,000	3%
	40,000,000	

BUSHELS PER YEAR	Actual	% Cont	Limited Potential (bushels)	Conversion	Limited Potential (tons)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,880,000	29.364%	11,745,625	56	328,878
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Total	**23,430,000**	**100%**	**40,000,000**		**1,129,731**

Emission Point	Emission Process	Processing Rate (tpy)	Processing Rate (pounds per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions
Dryer #2	Drying (uncontrolled)	164,376	37,529	0.22	18.081	0.055	4.520
Dryer #1	Drying (uncontrolled)	164,376	37,529	0.22	18.081	0.055	4.520
	TOTAL =	328,752			**36.163**		**9.041**

Methodology

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate * Emission Factor / 2000 (lbs/ton)

AP 42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest season. Terminal elevators dry, clean, blend and store grain for shipment to other terminals or processors, or for export. These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators

Appendix A: Emissions Calculations

Grain Elevator

Small Country Terminal Elevator (Shipping)

Company Name: Ag Producer Services, Cargill, Inc.

Address City IN Zip: 500 East State Road 28, Tipton, IN 46072

CP: 159-12501-00005

Plt ID: 159-12501-00005

Reviewer: ERG/RGO

Date: 09/07/00

ACTUAL HOURS OF OPERATION	
Hours per day:	24
Days per week:	7
Weeks per year:	52
)URS PER YEAR:	8760

Potential Scenario	Proposed	% Contribution
Truck Dump#1	23,280,000	58%
Truck Dump#2	15,520,000	39%
Asphalt Pad	1,200,000	3%
	40,000,000	

BUSHELS PER YEAR	Actual	% Cont	Potential (bushels)	Conversion	Potential (tons)
Corn:	13,700,000	58.472%	23,388,818	56	654,887
Bean:	6,880,000	29.364%	11,745,625	56	328,878
Wheat:	2,850,000	12.164%	4,865,557	60	145,967
Total	**23,430,000**	**100%**	**40,000,000**		**1,129,731**

Emission Point	nission Proce	Processing Rate	Processing Rate (pounds per hour)	PM Emission Factor	PM Emissions (tpy)	PM10 Emission Factor	PM10 Emissions (tpy)	Control Efficiency (%)	Controlled PM Emissions (tpy)	PM-10 Emissions (tpy)
Rail Loadout (includes direct loadout)	Shipping	1,129,731	257,929	0.027	15.251	0.0022	1.243	99.00%	0.153	0.012
	TOTAL =	**1,129,731**			**15.251**		**1.243**		**0.153**	**0.012**

Methodology

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Uncontrolled Grain Elevators (5th Edition Supplement 1998)

Actual throughput of 23 million bushels bushels in a year were scaled to the maximum of 40 million bushels

Potential Emissions in ton/yr = Processing Rate * Emission Factor / 2000 (lbs/ton)

AP 42 9.9.1-1 - Country elevators are generally smaller elevators that receive grain by truck directly from farms during harvest season. Terminal elevators dry clean, blend and store grain for shipment to other terminals or processors, or for export. These elevators may receive grain by truck, rail, or barge, and generally have greater grain handling and storage capacities than country elevators.